

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION

CORTEZ D. BROWN, DEONTAE TATE,
and JEREMY S. MELTON on behalf of
themselves and all similarly situated
persons,

PLAINTIFFS,

v.

BILL OLDHAM, in his individual capacity
and in his official capacity as the Sheriff of
Shelby County, Tennessee; ROBERT
MOORE, in his individual capacity and in
his official capacity as the Jail Director of
the Shelby County, Tennessee;
CHARLENE McGHEE, in her individual
capacity and in her official capacity as the
of Assistant Chief Jail Security of Shelby
County, Tennessee; DEBRA HAMMONS,
in her individual capacity and in her
official capacity as the Assistant Chief of
Jail Programs of Shelby County,
Tennessee; SHELBY COUNTY,
TENNESSEE, a Tennessee municipality;
and TYLER TECHNOLOGIES, INC., a
foreign corporation

DEFENDANTS.

Case No. 2:17-cv-02015-JTF-dkv

(Honorable John T. Fowlkes, Jr.)

**CLASS ACTION COMPLAINT FOR
VIOLATIONS OF THE CIVIL
RIGHTS ACT OF 1871, 42 U.S.C. §
1983, AND TENNESSEE COMMON
LAW**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV. PRO.
38(a) & (b)**

**PLAINTIFFS' RULE 23(g)(3) MOTION FOR APPOINTMENT OF INTERIM CLASS
COUNSEL AND INTERIM LIAISON CLASS COUNSEL**

Plaintiffs Cortez D. Brown, Deontae Tate and Jeremy S. Melton (hereinafter collectively referred to as "Plaintiffs"), and by and through their undersigned counsel of record, and, pursuant to Rule 23(g)(3) of the Federal Rules of Civil Procedure, submit their Motion for Appointment of

Frank L. Watson, III and William F. Burns, partners of the law firm of Watson Burns, PLLC, as Interim Class Counsel and Joseph S. Ozment of the Law Office of Joseph S. Ozment, PLLC and Lorna S. McClusky of Massey, McClusky, McClusky & Fuchs as Interim Liaison Class Counsel in this matter. Plaintiffs rely upon their contemporaneously filed Memorandum of Law and its Exhibits attached thereto in support.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs Cortez D. Brown, Deontae Tate and Jeremy S. Melton , pursuant to Rule 23(g)(3), respectfully move this Honorable Court to Frank L. Watson, III and William F. Burns, partners of the law firm of Watson Burns, PLLC, as Interim Class Counsel and Joseph S. Ozment of the Law Office of Joseph S. Ozment, PLLC and Lorna S. McClusky of Massey, McClusky, McClusky & Fuchs as Interim Liaison Class Counsel in this matter.

DATED: this 30th day of January, 2017

Respectfully submitted,

/s/ Frank L. Watson, III

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*Counsel for Plaintiffs Cortez D. Brown, Deontae
Tate and Jeremy S. Melton on behalf of themselves
and the absent Class Members*

LOCAL RULE 7.2(a)(1)(B) CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), on January 27, 2017, Frank L. Watson, III, counsel for Plaintiffs, consulted by telephone with Claiborne H. Ferguson, counsel for Plaintiff in the action styled *Issacca Powell v. Bill Oldham, Sheriff of Shelby County, Individually and in his official capacity*, 2:16-cv-02907-SHM-tmp, and was unable to reach an accord as to the instant Motion for the appointment on Interim Class Counsel and Interim Liaison Class Counsel.

On January 24, 2017, Mr. Watson also conferred by telephone with Robert E. Craddock, counsel to Defendants Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons and Shelby County, and on January 25, 2017, Mr. Watson conferred by telephone with Bradley E. Trammel, counsel to Defendant Tyler Technologies, Inc., concerning the instant Motion. The Defendants have not consented to said Motion and have reserved their rights to oppose or otherwise respond to Plaintiffs' Motion.

/s/ Frank L. Watson, III

Frank L. Watson, III

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that the above and foregoing was filed on January 30, 2017, using the CM/ECF system with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court to the following parties and/or served via U.S. Mail postage pre-paid and by email:

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s/ Frank L. Watson, III
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